<u>REMARKS</u>

This application has been reviewed in light of the final Office Action dated May 18, 2006. In view of the foregoing amendments and the following remarks, favorable reconsideration is respectfully requested.

Claims 1 and 3-15 are pending. Claims 1, 13 and 14 have been amended. Support for the claim changes can be found in the original disclosure, and therefore no new matter has been added. Claims 1, 13 and 14 are in independent form.

In the final Office Action dated May 18, 2006, Claims 1 and 3-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,269,336 (*Ladd et al.*) in view of U.S. Patent No. 6,115,686 (*Chung et al.*).

Without conceding the propriety of that rejection, the independent claims have been amended. Applicants submit that, for at least the following reasons, the amended independent claims are patentable over the art cited in the May 18, 2006 Office Action.

Independent Claim 1 recites, *inter alia*, rule identification information extraction means for extracting rule identification information from a predetermined tag in a document obtained by document obtaining means, and rule selecting means for selecting a rule corresponding to the extracted rule identification information from among a plurality of rules based on the extracted rule identification information stored in a rule memory, each of the plurality of rules specifying respective sections of voice output contents and voice input candidates in an obtained document, and said rule selecting means selecting a predetermined one of the plurality of rules if the predetermined tag is not contained in the obtained document. Each of independent Claims 13 and 14 recites similar or identical features.

Applicants submit that, for at least the following reasons, nothing in the art cited in the May 18, 2006 Office Action would teach or suggest at least the above-noted features recited in Claim 1.

Ladd et al. relates to a voice browser for interactive services and methods thereof. According to *Ladd et al.*, a parser unit 302 receives a markup language document from a network fetcher unit 300 and parses the information in the document according to syntax rules of a markup language, and an interpreter unit 304 determines a next state or step based on a structure of a dialogue and inputs from a user. See col. 12, lines 17-20; col. 13, lines 55-59; and col. 16, lines 12-18.

Regarding the document obtaining means and the rule identification information extraction means of Claim 1 (as that claim stood prior to the instant Amendment), the Office Action (pages 2-3) cited the following from *Ladd et al.*:

> The <u>network access apparatus</u> of the system allows the user to access (i.e., view and/or hear) the information retrieved from the <u>information source</u>. **(Col. 3, lines 40-42)**. The information can be stored in a database of the information source and can include text content, <u>markup language</u> document or pages **(Col[.] 11, lines 42-45)**. The nested HTML tags [*sic*] (Emphasis in original.)

Nothing in the above-cited portions of *Ladd et al.* is understood to teach at least the rule identification information extraction means of Claim 1. In particular, *Ladd et al.*'s teaching that "[t]he information . . . can include text content, markup language document or pages, non-text content, dialogs, audio sample data, recognition grammars, etc." (col. 11, lines 42-45) is not understood to teach or suggest "extracting rule identification information from . . . the document" or "extracting rule identification information from a predetermined tag in the document," as claimed in Claim 1. Nothing in *Ladd et al.* is understood to teach or suggest the rule

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identification information extraction means of Claim 1. (In-depth argument pertinent to this point was presented in the Amendment filed on March 3, 2006.)

Regarding the rule selecting means of Claim 1, the Office Action (pages 3-4) is understood to concede (in response to the arguments presented in the Amendment filed on March 3, 2006) that *Ladd et al.* does not teach or suggest this element of Claim 1 (as that claim stood prior to the instant Amendment), other than "rule selecting means for selecting a rule defining voice input/output contents from a plurality of predetermined rules." Applicants do not concede that *Ladd et al.* teaches "rule selecting means for selecting a rule defining voice input/output contents from a plurality of predetermined rules." Applicants submit that *Ladd et al.* does not teach or suggest the rule selecting means of Claim 1.

Chung et al. relates to a hyper text mark up language document to speech converter. According to *Chung et al.*, an HTML parser 24 parses an HTML document file 23 to produce HTML tags, content text, and HTML-to-speech (HTS) control rules. Col. 6, lines 19-20. The HTS rules are output to HTS control parser 22. Col. 6, lines 23-24. The HTS control rules may be embedded in comment tags in HTML document files 23. Col. 6, lines 17-42.

Regarding the rule identification information extraction means of Claim 1 (as that claim stood prior to the instant Amendment), the Office Action made no reference to *Chung et al.*

Regarding the rule selecting means of Claim 1 (as that claim stood prior to the instant Amendment), the Office Action (pages 4-5) stated the following regarding *Chung et al.*:

> Chung et al . . . teaches in figures 1-5b, the HTML parser 24 outputs the HTS control rules to the HTS control parser 22 wherein the HTS control parser can receive four different types of rules (intonation, audio data rule, enunciation rule and terminology

translation rule). Furthermore, the HTS control rules 110-180 embedded in the HTML comment tag wherein the rules (110-180) are designated by identifiers. (col. 6, lines 9-61). [*sic*]

Although *Chung et al.* mentions HTS control rules embedded in comment tags in HTML document files, nothing in the above-cited portions of *Chung et al.* is understood to teach or suggest at least "extracting rule identification information from a predetermined tag in the document" or "selecting a predetermined one of the plurality of rules if the predetermined tag is not contained in the obtained document," as claimed in Claim 1.

Regarding Claim 4, the Office Action (page 5) stated the following regarding *Chung et al.*:

> Chung et al teach rule selecting means selects a predetermined rule if said rule identification information extraction means cannot . . .in the obtained document 9 his HTS parser 22, his tag mapping table 41, his parameter 42 and his audio table 43). [*sic*]

It is noted that the above language in the Office Action regarding Claim 4 seems to be partly unintelligible and may contain omissions. Nonetheless, none of the teachings of *Chung et al.* mentioned therein is understood to remedy the above-noted deficiencies of *Chung et al.* with respect to Claim 1. Moreover, it is noted in particular that, if *Chung et al.* taught or suggested the above-quoted subject matter of Claim 1 (namely, "extracting rule identification information from a predetermined tag in the document" and "selecting a predetermined one of the plurality of rules if the predetermined tag is not contained in the obtained document"), that subject matter could be expected to be found in Fig. 6 (a flow chart illustrating the operation of the document reader 28), Fig. 7 (a flowchart illustrating the processing of the HTS control parser 22), and/or the descriptions of those figures in the specification (col. 8, line 56 - col. 9, line 28). However, that subject matter is not seen to be taught or suggested in those portions of *Chung et al.*

Applicants submit that nothing in *Chung et al.* would teach or suggest the rule identification information extraction means or the rule selecting means of Claim 1.

Since neither *Ladd et al.* nor *Chung et al.* is understood to contain all of the elements of independent Claim 1, that claim is believed allowable over those documents. Since each of independent Claims 13 and 14 includes elements identical or similar to those of Claim 1, those claims are also believed allowable over those documents.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. These claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from independent Claim 1 and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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